

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In Re:

W.R. GRACE & CO., et al.,

Reorganized Debtors.

Chapter 11

Case No. 01-01139 (KJC)  
(Jointly Administered)

Hearing Date: April 2, 2014 at 11:00 a.m. (ET)  
Objection Deadline: March 26, 2014 at 4:00 p.m. (ET)

Relates to D.I. 31794, 31846

NOTICE OF PROPOSED ORDER STAYING DISBURSEMENT OF COMMON FUND  
FEE AWARD PENDING RESOLUTION OF ALL COMMON FUND FEE  
ALLOCATION DISPUTES

PLEASE TAKE NOTICE that on February 28, 2014, Lukins & Annis, P.S. (the “Movant”), by and through its undersigned counsel in the above-captioned case, filed the **Partial Joinder of Lukins & Annis P.S. in Motion of ZAI Class Counsel for a Common Fund Fee Award, and Counter-Motion to Stay Disbursement of Any Common Fund Fee Award Pending Resolution of All Common Fund Fee Allocation Disputes** (Docket No. 31794) (the “Counter-Motion”). You were previously served with a copy of the Counter-Motion and the **Notice of Counter-Motion to Stay Disbursement of Any Common Fund Fee Award Pending Resolution of All Common Fund Fee Allocation Disputes** (the “Notice of Motion”) (Docket No. 31846).

PLEASE TAKE FURTHER NOTICE that, as set forth in the Notice of Motion, objections, if any, to the Counter-Motion must be made in writing, (i) filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 **on or before March 26, 2014 at 4:00 p.m. (ET)** (the “Objection Deadline”) and (ii) served so as to be actually received by the undersigned on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) to consider the Counter-Motion is scheduled to be held before the Honorable Kevin J. Carey, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 5<sup>th</sup> Floor, Courtroom No. 5, 824 Market Street, Wilmington, Delaware 19801 **on April 2, 2014 at 11:00 a.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, attached hereto as Exhibit A is the proposed form of order (the “Proposed Order”) granting the relief requested by the Counter-Motion. The Movant intends to seek the Court’s approval of the Proposed Order at the Hearing. The Movant reserves all rights to alter, amend, update or modify the Proposed Order at or prior to the Hearing.

Dated: March 13, 2014  
Wilmington, Delaware

Respectfully submitted,

**PEPPER HAMILTON LLP**

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